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TECHNICAL STATUS REPORT

CH2MHILL

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DATE: January 10, 1996

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: December 1 through December 31, 1995

PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The EPA status report was faxed to EPA on December 8. Hard copies of the EPA status report were sent out on December 8.

Task A2-Applicable Regulations and Permits

Storm Water Discharges.

The large 800,000-gallon tank on site that has been used to hold storm water is continuously being discharged to the METRO sewer. The water is being discharged through a 1-inch diameter fitting on the bottom of the tank; the approximate rate of discharge to METRO is 500 gallons/day. The tank will be cleaned out once the tank is emptied.

Sewer Lines Clean Out.

On December 18, Sue Hays/Hays Consulting received a copy of a letter from Boeing to Ecology documenting the analytical results of the September 21, 1995, spill from sewer

cleaning. Boeing verbally reported this spill to Ecology in September. The sample was analyzed for polar and nonpolar fats/oils/grease (FOG), TCLP metals, and PCBs. Polar and nonpolar FOG and PCBs were not detected in the sample. TCLP copper was detected at 0.126 mg/l, zinc at 0.340 mg/l, and barium at 9.165 mg/l. TCLP mercury was detected at 0.296 µg/l. No other TCLP metals were detected.

Task A3-Interim Measures

PCB Ditch Excavation.

The PCB ditch area was excavated until immunoassay samples (proposed EPA Method 4020) indicated that the excavation was clean. However, immunoassay samples indicated that some contamination remained under the north/south trending pipe; no more dirt could be removed in this area due to a concrete barrier. Verification samples were sent to Maxwell S-Cubed Laboratory for analysis; results were available on December 8. The highest concentration detected by S-Cubed was 31 mg/kg Arochlor 1254; the next highest was 3.83 mg/kg Arochlor 1254. These are below the MTCA Method C Industrial Soils concentration of 70,000 µg/kg. A report describing the excavation and the analytical results is currently being developed.

The three piles of PCB-contaminated soil generated during excavation of the PCB ditch remain onsite; they are placed on heavy plastic and covered with heavy plastic. The Arochlor 1254 concentrations in the piles were: Pile A - 22.2 mg/kg, Pile B - 28.7 mg/kg, and Pile C - 7.9 mg/kg. A combined composite sample from the three piles was analyzed for toluene (undetected at 5 µg/kg) and TCLP metals (all values below limits). There has been some discussion with AETS regarding whether or not these soils are TSCA regulated; AETS faxed CH2M HILL a letter they received from EPA Region 10 TSCA group indicating that these soils may be TSCA wastes. However, there is no mention of this in the regulations or in preambles to the regulations. Clarification has been requested from EPA HQ TSCA branch. Due to the government shutdown, no response has been received yet. Soils disposal is expected to occur once the issue of TSCA regulation of the soils is clarified.

LNAPL.

RP monitored the wells for LNAPL on December 31. Five wells were not accessible at this time since either containers belonging to Northwest Container were being stored on top of them or the area around the well was flooded due to heavy rainfall; these wells were DM-7, DM-6, B5, G1, and B6.

A 0.20-foot layer of LNAPL was found in well H10. The sample from well MW-12 had a film, while the samples from wells H11 and MW-15 had a sheen. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

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Task A8-Round 3 Technical Memorandum

Work continues on the Round 3 Technical Memorandum. This document is expected to be submitted to EPA in January 1996.

Task S1-Miscellaneous Field Support

API Separator Clean Out.

Laboratory results from Sound Analytical indicated that the API separator sludge did not fail the test for TCLP for metals and was, therefore, not a RCRA hazardous waste. Since Chemical Waste Management is not allowed to accept non-RCRA waste for stabilization and landfilling, incineration at one of RP's Basic Chemicals Incinerator Services facilities is being investigated. A representative sample of the contents of the API separator and a Material Profile Data Sheet were sent to the RP facility's laboratory (Peiser) on November 20. Based on the results of this analysis, two RP facilities (Hammond and Houston) have approved this waste stream for disposal at their facility. Currently, RP is awaiting arrangments on transportation and hope to get this waste shipped from the Seattle site by February.

PCB-Contaminated Sewer Wash Water.

On December 8, the second filtration of the 5,000 gallons of PCB-contaminated sewer wash water was completed; the filtered water was placed in a clean Rain-for-Rent tank (#239617). The dirty Rain-for-Rent tank (#238727) was cleaned by CEcon Corporation on December 21, and the sludge and cleaning water were placed in one drum. A laboratory analysis of the filtered water indicated that the copper concentration was 10 mg/l, down from 21 mg/l copper after the previous filtering. However, 10 mg/l copper is still above METRO's discharge limit of 8 mg/l copper. The total PCB concentration after the second filtration was 430 µg/l, down from 840 µg/l after the first filtering. A third filtration of the water through clean 5-micron fabric filters was begun on December 26. The filtrate is being collected in the recently cleaned Rain-for-Rent tank (#238727).

Sewer Wash Water in Rain-for-Rent Tank.

Samples of the non-PCB-contaminated wash water were collected by Buzz Rahier and Sue Hays on December 12. Aliquots were taken from 2 feet, 4 feet, and 6 feet below the top of the water surface in the tank and composited for analyses; this composite was analyzed for PCBs and total copper. A grab sample was also taken from 4 feet below the top of the water surface (2.67 feet from the bottom of the tank); this sample was analyzed for total copper.

Results of these analyses were received on December 20. 5.4 mg/l total copper and 120 µg/l Arochlor 1254 were detected in the composite sample, and 5.9 mg/l total copper

was detected in the grab sample. All of these concentrations are below the METRO discharge limits. However, approximately 5 inches of silt has settled in the bottom of the tank; METRO does not allow visibly turbid waters to be discharged to the METRO sewer system; as a result, the non-PCB-contaminated water will also need to be filtered. This filtering will be done after the PCB-contaminated water is filtered (see below).

Task S3-Laboratories

Due to problems with the existing laboratory, CH2M HILL is in the process of re-procuring analytical services. The bid package was sent to IEA, ARI, S-Cubed, Quanterra, and QAL. Bids from all the labs, except Quanterra, were received and are being evaluated.

Deliverables Submitted

The November Progress Report was submitted to U.S. EPA on December 8, 1995.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete; this will probably occur in February, weather permitting.

Storm Water.

The remaining storm water in the 800,000-gallon tank on site will be discharged to METRO. Sediments in the bottom of the tank will then be cleaned out and managed with the non-PCB-contaminated wash water sediments.

Task A3-Interim Measures

PCB Ditch Excavation.

Three piles of PCB-contaminated soil will be disposed of once a disposal facility has been identified. Soils disposal is expected to occur once the issue of TSCA regulation of the soils is clarified. Clarification has been requested from EPA HQ TSCA branch and is expected once the government shutdown is over.

LNAPL.

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly. Starting in January 1996 RP will limit the number of wells for LNAPL sampling, as discussed in our June meeting with EPA and in the October 1995 status report.

Task A8-Round 3 Data Technical Memorandum

As discussed in previous status reports, due to the problems associated with the data and the need for additional sewer line cleaning, the Round 3 Data Technical Memorandum will be submitted to EPA and Ecology in January 1996.

Task S1-Miscellaneous Field Support

Drum Disposal.

Drums remaining onsite include lab packs (accumulation date 10/20/95), acids, soil cuttings, PPE, and a transformer. These drums will be held and sent off site with drums that will be generated in the near future (e.g. during the PCB ditch excavation).

API Separator Clean Out.

The API Separator will be cleaned out and the resulting wastes disposed of, once an approved facility has been identified. Incineration at one of RP's Basic Chemicals Incinerator Services facilities is one option being investigated. Cleaning and disposal of API separator waste is expected to occur in January/February.

PCB-Contaminated Sewer Wash Water.

Filtrate from the third filtering of the 5000 gallons of PCB-contaminated sewer wash water will be tested for METRO discharge parameters. If the filtrate does not meet METRO discharge parameters, other options for disposal will be investigated.

Sewer Wash Water in Rain-for-Rent Tank.

The remaining non-PCB-contaminated wash water cannot be filtered for discharge to METRO until the PCB-contaminated water is gone from the site. Three 20,000-gallon Rain-for Rent tanks are currently on site: the PCB-contaminated water is being filtered between two of them; the third holds most of the non-PCB-contaminated water. There is not enough space to place another 20,000-gallon Rain-for-Rent tank next to the non-PCB-contaminated wash water tank.

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Outfall 4 Wash Water in Aluminum Tank.

Sound Analytical filtered the wash water sample through an 8-micron filter. The filtration reduced the copper concentration from 30 mg/L to 3.5 mg/L. RP plans to filter this water through a 5-micron filter on site, to analyze the filtrate for copper, and to discharge the filtrate to METRO if the copper concentration is 8 mg/L or less. This is expected to occur in January.

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